



To: Federal Communications Commission Secretary

From: LauraBeth Huffine

Date: 10.26.2005

Re: Comment on Amateur Service Rules: WT Docket No. 05-235; FCC 05-143

My name is LauraBeth Huffine and I am a second year law student at the University of Tennessee. I am interested in ham radios and would like the opportunity to comment on a proposed amendment to Amateur Service Rules listed as WT Docket No. 05-235; FCC 05-143, wherein the amendment is to eliminate the Morse code as a licensing requirement. In this comment, I will present the reasons why the amendment to remove the Morse code requirement is necessary and should be adopted. I believe the amendment, if adopted, will better serve the public interest by enabling more individuals to acquire amateur radio licenses.

First, the Morse code is an outdated mode of communication that not only hinders technological advancement, but also may deter many new individuals from applying for an amateur license. Second, greater access to ham radios can help get relief to victims when a disaster strikes. Additionally, the international community no longer recognizes the need for a Morse code requirement. Adoption of this amendment will make the United States consistent with the overall international community. Also, any effect on amateur radio training material already published will be minimal. Finally, adoption of the amendment will allow the FCC to free up resources by dropping the Morse code requirement, thus enabling employees to spend more time on technological advances and less time on reviewing applications.

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Outdated Communication Deters Accessibility

Having to learn Morse code is an unnecessary requirement that may dissuade many individuals from applying for an amateur license and could also obstruct technological advancements. In a speech given by the Chief of the Office on Engineering and Technology of the FCC, it was noted that the future of ham radio is tied with new technology.¹ The Morse code, first developed in 1832, is an obsolete form of communication that slows technological advancement.² Amateur radio is clearly seen as having to evolve along with new technology. The Morse code has become a hindrance to the technological advancement of amateur radio users. According to one Wall Street Journal reporter, knowing the Morse code is a lot like knowing Latin; thus, this knowledge only acts as a deterrent to would-be applicants.³

Additionally, as you well know, the World Radiocommunication Conference in 2003 (WRC-03) made the international Morse code requirement discretionary among individual countries and, accordingly, many countries have already dropped their Morse code requirement.⁴ Technology has greatly advanced from the days Morse code was first used. Today, there are easier and faster methods of communicating with one

¹ Dale N. Hatfield (W0IFO), Remarks on the Role of Amateur Radio in the New Century, AMRAD's 25th Anniversary Dinner, June 17, 2000.

² Norm Fusaro, *History of Morse Code*, 19 April 2005 at <http://www.arrl.org/FandES/ead/learnw/>

³ Lee Gomes, *To Ham Operators, Morse Code Is A Lot Like Latin Exam*, Wall Street Journal, Section A1, June 2, 1999.

⁴ See, *FCC Proposes to Drop Morse Code Requirement for All License Classes*, American Radio Relay League, Inc., 11 Aug. 2005 at <http://www.arrl.org/news/stories/2005/07/20/100/?nc=1>

another. The world is swiftly moving away from the technology and communication practices of a past era. Overall, communications around the world have become more accessible due to new technology. One of the main objectives of the Amateur Radio Service is to encourage and extend advancement of the radio art.⁵ The Morse code requirement serves only as a hindrance, not a way of increasing the number of new amateur radio operators. Therefore, I believe it is only a matter of time before the Morse code is dropped from the requirements to attain an amateur license. Requiring an outdated 175-year-old method of communication as a requirement for a license discourages many new individuals from seeking a license.

Disaster Aid

Amateur radio operators have a special opportunity and mission to help in the time of a disaster. Another purpose of the Amateur Radio Service is to enhance communications during a disaster. Thus, making amateur radio attractive to more individuals serves as a benefit, even to those who never hold a license.⁶ In a time when disasters are all too common, amateur radio operators around the world have the unique opportunity to provide help when traditional modes of communication are down. For example, amateur radio operators were able to assist in the Katrina disaster, as reported by MSNBC Columnist Gary Krakow.⁷ During the Katrina aftermath, amateur radio operators volunteered their time and equipment to take part in the Amateur Radio Emergency Service. He explains in his column that through the help of cell phone

⁵ 47 CFR § 97.1

⁶ 47 CFR § 97.1

⁷ Gary Krakow, *Ham Radio Operators to the Rescue*, Sept. 6, 2005, at <http://www.msnbc.msn.com/id/9228945>.

callers and amateur radio operators, fifteen people were rescued from the floodwaters in New Orleans on August 29. Krakow details that one member of the fifteen called a relative in Baton Rouge, who called the local Red Cross. The Red Cross used an amateur radio station to make a call to Oregon, which then went to Utah, and then to Louisiana emergency personnel, allowing these individuals to get to safety. Krakow further explains in his column that such stories of rescue by the help of amateur radio services were not uncommon in the Katrina aftermath. Additionally, Krakow says the American Radio Relay League, which represents amateur radio operators, is extending the Katrina relief through their efforts. This organization is seeking volunteers to go beyond monitoring radios for distress calls by helping the Red Cross with communications for the feeding and sheltering operations in Mississippi, Alabama and upper-Florida.

As you can see by this reporter's article, amateur radios play an important part in providing relief to those caught up in disaster. The benefit of allowing more Americans to acquire an amateur license can clearly extend beyond those who hold such a license. Many Americans may directly benefit by a more lenient and reasonable standard, because a greater number of amateur radio operators can provide help in the unfortunate event that a disaster strikes and traditional lines of communication are down or 9-1-1 centers are jammed. The more Americans have access to ham radios, the greater will be the likelihood of aid getting to people caught in a disaster, both in the U.S. and around the world.

Effect on Publishers

The effect of the amendment on publishers of training materials should be insignificant when looking at all the important benefits to be gained by making amateur radio more attractive and accessible. As you know, there are publishers who provide training materials to individuals applying for an amateur license. Undoubtedly, if the Morse code requirement is taken out of the license requisites, these publishers will have to update their materials, which could possibly cause a financial impact among some of the publishing companies. To keep the Morse code as a licensing requirement just so the publishing companies will not be affected would be an injustice to the Americans that want to pursue amateur radio licenses and those that would benefit from more radio operators. The U.S. Government should be more concerned with what is best for the majority of its citizens, not with what is best for a few private companies. There will still be a market for these companies from individuals who want to learn Morse code.

As noted, one of the purposes of the Amateur Radio Service is to promote improvements with trained operators, technicians and electronic experts.⁸ Most radio operators need and want to continually improve their knowledge and skills. The affected publishers could refocus their training materials on improving the technological side of amateur radio and help the many operators interested in learning more.

In addition, as a law student, I purchase a large quantity of examination materials that are updated annually. Publishers of Morse code training materials may also have to update their information on an annual basis. If their materials have not been revised, than perhaps it is better for them and their customers to have updated materials. The

⁸ 47 CFR § 97.1

FCC would probably be better served if the materials were updated as well. Companies that focus only on Morse code training materials will need to find other markets. They frankly need to join the twenty-first century and find new areas to provide training. The FCC's decision should not be motivated by what is best for the bottom line of a few publishing companies, but what is best for amateur radio as a whole.

International Issues

Although it could be argued that the Morse code could be helpful in communicating internationally, the international community does not hold this point of view. The Morse code was used as an international standard for maritime communication until 1999, when it was replaced by the Global Maritime Distress Safety System.⁹ The French Navy ceased using the Morse code in 1999. Its final message was, "Calling all: This is our last cry before eternal silence."¹⁰

As you can see, other organizations and countries found better and more efficient ways of communicating rather than using the Morse code. One arguable reason to keep the Morse code requirement would be for international communications, where the language barrier presents a problem. As you know, a purpose of the Amateur Radio Service is to foster international good will.¹¹ However, the international community has already decided that the Morse code may be dropped from a country's licensure

⁹ *Modern International Morse Code*, Morse Code – Wikipedia, 22 October 2005 at http://en.wikipedia.org/wiki/Morse_code

¹⁰ Id.

¹¹ 47 CFR § 97.1

requirements.¹² Communication among individuals of different nations is no longer as difficult as it used to be thanks to advancements in other areas of communication, such as the Internet. The fact that other countries have already adopted this measure shows the trend in the international community against the Morse code.¹³ The U.S. should follow the international consensus.

Additionally, since the international community no longer sees the need for the Morse code requirement for an amateur license, it will be only a matter of time before nearly all countries drop the Morse code. Of course, a country may choose to keep the Morse code requirement, but the U.S. now has an opportunity to lead the way in technological advancement by dropping the Morse code and encouraging newer technology to take root in the amateur radio field.

Allocation of Resources

Resources that are now used to test applicants on the Morse code could be used in ways to streamline the Amateur Radio Service and implement newer technology. As noted, the Chief of the Office on Engineering and Technology of the FCC believes that technology is the driving force behind ham radio in the future.¹⁴ Of course, this is best done when resources are allocated more efficiently.

¹² *Modern International Morse Code*, Morse Code – Wikipedia, 22 October 2005 at http://en.wikipedia.org/wiki/Morse_code

¹³ *FCC Proposes to Drop Morse Code Requirement for All License Classes*, American Radio Relay League, Inc., 11 Aug. 2005 at <http://www.arrl.org/news/stories/2005/07/20/100/?nc=1>

¹⁴ Dale N. Hatfield (W0IFO), Remarks on the Role of Amateur Radio in the New Century, AMRAD's 25th Anniversary Dinner, June 17, 2000.

Furthermore, the individuals who still want to communicate with the Morse code are free to do so, there will simply no longer be an administrative burden on all amateur radio users. Dropping the requirement simply helps to streamline the administrative process by which individuals apply for a license—it in no way dictates how they are to communicate once they receive their license. By freeing up the resources used to implement the Morse code requirement, employees can spend more time and energy on areas that will benefit all operators of ham radios.

Conclusion

In conclusion, I urge you to adopt the amendment that eliminates the Morse code requirement. The Morse code is outdated and obsolete and may very well discourage many Americans from applying for an amateur radio license. As noted, the international community no longer sees the need for such a requirement. Having more operators with greater access to ham radios could help the entire country in disaster relief. The effect on publishers is nominal, and the public interest is much more important. Finally, by allocating resources to other endeavors, the FCC can create a streamlined and high-tech amateur radio service that will serve its patrons for years to come.

Respectfully Submitted,

LauraBeth Huffine